

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

In Re:	: Bankruptcy No. 16-17455 AMC
Stefani L. Bohm a/k/a Stefani Ginsberg	: Chapter 13
Debtor	:
MTGLQ Investors, LP c/o Rushmore Loan	:
Management Services	:
Movant	:
	:
vs.	:
	:
Stefani L. Bohm a/k/a Stefani Ginsberg	:
Debtor/Respondent	:
and	:
William C. Miller, Esquire	:
Trustee/Respondent	:

**MOTION FOR RELIEF FROM AUTOMATIC STAY, UNDER 11 U.S.C. § 362**

Movant, by its Attorneys, Hladik, Onorato & Federman, LLP, hereby requests a Termination of the Automatic Stay and leave to proceed with its State Court rights provided under the terms of the Mortgage.

1. Movant is MTGLQ Investors, LP c/o Rushmore Loan Management Services (“Movant”).
2. Debtor, Stefani L. Bohm a/k/a Stefani Ginsberg (“Debtor”) is the owner of the premises located at 1031 Kingsdown Court, Ambler, PA 19044 (the “Property”).
3. William C. Miller, Esquire is the Trustee appointed by the Court.
4. Debtor filed a Petition for Relief under Chapter 13 of the Bankruptcy Code on October 24, 2016.
5. Movant is the holder of a mortgage lien on the Property in the original principal amount of \$359,600.00, which was recorded on January 20, 2016 (the “Mortgage”). A true and correct copy of the Mortgage is attached hereto as Exhibit “A.”
6. Debtor entered into a Loan Modification effective September 1, 2017, requiring Debtor to make monthly payments beginning on August 1, 2017. A true and correct copy of the Modification is attached hereto as Exhibit “B.”

7. Movant has not received the monthly Mortgage payments from September 1, 2018 through February 1, 2019 in the amount of \$2,490.13 each, less suspense of \$59.22, plus attorney fees and costs in the amount of \$1,031.00, for a total post-petition arrearage of \$15,912.56.

8. Movant has cause to have the Automatic Stay terminated, in order to permit Movant to complete foreclosure on its Mortgage.

**WHEREFORE**, Movant respectfully requests that this Court enter an Order:

- a. Modifying the Automatic Stay under 11 U.S.C. § 362 of the Bankruptcy Code with respect to the Property as to permit Movant to foreclose on its Mortgage and allow Movant or any other purchaser at Sheriff's Sale to take legal or consensual action for enforcement of its right to possession of, or title to; and
- b. Granting any other relief that this Court deems equitable and just.

Respectfully Submitted,

Date: 02/20/2019

/s/Danielle Boyle-Ebersole, Esquire  
Danielle Boyle-Ebersole, Esquire  
Hladik, Onorato & Federman, LLP  
298 Wissahickon Avenue  
North Wales, PA 19454  
Phone 215-855-9521  
Fax 215-855-9121